



THE CITY OF NEW YORK
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June 30, 2021

VIA ECF

Honorable Mary Kay Vyskocil
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Lopez v. New York City Dept. Homeless Services et al.*,
Case No. 17 CV 3014 (MKV)(OTW)

Dear Judge Vyskocil:

I am the Assistant Corporation Counsel assigned to represent the City Defendants in the above-referenced case. I write, with plaintiff's consent, to update the Court on the status of settlement negotiations in the above-referenced case.

While this case was commenced as a relatively straightforward damages action by a *pro se* individual, the scope of the settlement discussions have broadened substantially in an effort to effectuate systemic reform. As a result, discussions have taken longer than would be expected based upon the complaint. We are pleased to report that the parties have made substantial progress in their settlement discussions but have not yet arrived at a final agreement. The parties are still considering how to resolve the individual claim for damages and clarifying details for systemic policy changes that are satisfactory to both parties.

The parties are thus requesting that the Court grant them until September 30, 2021, to resolve this matter. In the event that the parties are unable to reach a resolution, we will ask the Court enter a scheduling order that provides for a deadline by which plaintiff could amend the complaint and to permit limited discovery (discovery has been foregone in favor of directing resources to resolve the broader issues), with dispositive motions to follow. The parties would alert the Court that a prior motion for limited discovery was postponed when they entered into settlement negotiations.

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Consistent with the Court's previous orders, the parties will submit monthly status letters concerning their progress towards settlement if the Court so requests.

Respectfully yours

/s/Stephen Kitzing

Stephen Kitzing

Assistant Corporation Counsel

All appearing counsel